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Attorneys for Defendant

UNITED STATES DISTRICT COURT

DISTRICT OF NEVADA

THERESA M. WEESNER,

Plaintiff,

v.

NANCY A. BERRYHILL¹,
Acting Commissioner of Social Security,

Defendant.

)
) Case No. 2:16-cv-02018-RFB-PAL

) **JOINT STIPULATION AND [PROPOSED]**
) **ORDER FOR EXTENSION OF TIME TO FILE**
) **DEFENDANT'S NOTICE OF VOLUNTARY**
) **REMAND OF THE CASE OR CROSS-**
) **MOTION TO AFFIRM**

)
) **(Second Extension Request)**

¹ Nancy A. Berryhill is now the Acting Commissioner of Social Security. Pursuant to Rule 25(d) of the Federal Rules of Civil Procedure, Nancy A. Berryhill should be substituted for Acting Commissioner Carolyn W. Colvin as the defendant in this suit. No further action needs to be taken to continue this suit by reason of the last sentence of section 205(g) of the Social Security Act, 42 U.S.C. § 405(g).

1 Plaintiff Theresa M. Weesner (Plaintiff) and Defendant Carolyn W. Colvin, Acting
2 Commissioner of Social Security (Defendant), stipulate, with the approval of this Court, to an
3 extension of time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To
4 Affirm by two weeks from the current deadline of February 6, 2017 to **February 20, 2017**, with all
5 other dates in this Court's Order Concerning Review Of Social Security Cases extended accordingly.
6 This is Defendant's second request for an extension.

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8 Good cause exists to grant Defendant's request for extension. Counsel needs additional time
9 due to Counsel's unexpected illness and unanticipated and unscheduled medical leave.
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Defendant makes this request in good faith with no intention to unduly delay the proceedings.
Plaintiff has no objection and has stipulated to the requested relief.

Respectfully submitted this 3rd day of February 2017,

Date: February 3, 2017

By: /s/*Howard Olinsky
Howard D. Olinsky
*by email authorization on 2/3/17
Attorney for Plaintiff

Date: February 3, 2017

DANIEL G. BOGDEN
United States Attorney
HOLLY A. VANCE
Assistant United States Attorney

By: /s/ Roya Massoumi
ROYA MASSOUMI
Special Assistant United States Attorney


Of Counsel:
TINA L. NAICKER
Assistant Regional Counsel
Attorneys for Defendant

[PROPOSED] ORDER

For good cause appearing therein, IT IS HEREBY ORDERED that the Joint Stipulation for Extension of Time to file Defendant's Notice Of Voluntary Remand Of The Case or Cross-Motion To Affirm is GRANTED. Defendant shall file its response to Plaintiff's Motion on or before **February 20, 2017**. All other deadlines shall be extended accordingly.

IT IS SO ORDERED.

Dated: February 3, 2017


THE HONORABLE PEGGY A. LEEN
United States Magistrate Judge

CERTIFICATE OF SERVICE

I, ROYA MASSOUMI, certify that the following individual was served with a copy of the **JOINT STIPULATION AND [PROPOSED] ORDER FOR EXTENSION OF TIME TO FILE DEFENDANT'S NOTICE OF VOLUNTARY REMAND OF THE CASE OR CROSS-MOTION TO AFFIRM** on the date and via the method of service identified below:

CM/ECF:

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Respectfully submitted this 3rd day of February 2017,

/s/ Roya Massoumi
ROYA MASSOUMI
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OF COUNSEL:
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